

SULLIVAN HILL REZ & ENGEL  
A Professional Law Corporation  
James P. Hill, SBN 90478  
Christopher V. Hawkins, SBN 222961  
600 B Street, Suite 1700  
San Diego, California 92101  
Tel: (619) 233-4100  
Email: hill@sullivanhill.com  
hawkins@sullivanhill.com

Gerald Singleton, SBN 208783  
Amanda W. LoCurto, SBN 265420  
SINGLETON LAW FIRM, APC  
450 A Street, 5<sup>th</sup> Floor  
San Diego, CA 92101  
Tel: (619) 771-3473  
Email: gerald@slffirm.com  
amanda@slffirm.com

Attorneys for SLF Fire Victim Claimants

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re	)	Case No. 19-30088 (DM)
	)	
PG&E CORPORATION,	)	Chapter 11
	)	
and	)	(Lead Case–Jointly Administered)
	)	
PACIFIC GAS AND ELECTRIC	)	
COMPANY	)	<b>LIMITED OBJECTION BY SLF FIRE</b>
	)	<b>VICTIM CLAIMANTS TO DEBTORS’</b>
Debtors	)	<b>MOTION TO ENLARGE THE TIME</b>
	)	<b>WITHIN WHICH TO FILE NOTICES OF</b>
	)	<b>REMOVAL OF RELATED PLEADINGS</b>
	)	<b>[ECF 1738]</b>
Affects:	)	
<input type="checkbox"/> PG&E Corporation	)	Date: May 22, 2019
<input type="checkbox"/> Pacific Gas & Electric Company	)	Time: 9:30 a.m. (Pacific)
<input checked="" type="checkbox"/> Both Debtors	)	Place: United States Bankruptcy Court
	)	Courtroom 17, 16th Floor
* All papers shall be filed in the Lead Case,	)	San Francisco, CA 94102
No. 19-30088 (DM).	)	Hon. Dennis Montali
	)	
	)	Opposition Deadline: May 15, 2019, 4 p.m. (PDT)
	)	

1 On January 29, 2019, PG&E Corporation and Pacific Gas and Electric Company (collectively,  
2 “PG&E”) filed for bankruptcy. PG&E’s stated reason for seeking bankruptcy protection was that it  
3 was facing \$30 billion in damages from the 2015 Butte Fire, the 2017 North Bay Fires (18 fires in 10  
4 Northern California counties) and the 2018 Camp Fire.<sup>1</sup> Together these fires burned nearly 500,000  
5 acres, killed over 100 people, destroyed almost 20,000 homes, and left tens of thousands of people  
6 homeless.

7 The Singleton Law Firm Fire Victim Claimants (“SLF Claimants”) consist of over 4,700  
8 individuals who suffered injuries and damages in the fires started by PG&E and who are represented  
9 by the Singleton Law Firm, APC.<sup>2</sup> The SLF Claimants have victims from each of the three major  
10 fires/fire complexes involved in the bankruptcy: the 2015 Butte Fire (coordinated in Sacramento  
11 Superior Court under JCCP Number 4853), the 2017 North Bay Fires (coordinated in San Francisco  
12 Superior Court under JCCP Number 4955), and the 2018 Camp Fire (which had not been coordinated  
13 or consolidated at the time PG&E filed for bankruptcy). With respect to the 2017 North Bay Fires,  
14 SLF Claimants sustained damages in each of the 18 major fires. Accordingly, the SLF Claimants  
15 comprise a more complete representative group of fire victims than any other group.

16 On April 26, 2019, PG&E filed its motion requesting that the Court extend the deadline by  
17 which PG&E may file notices of removal under Bankruptcy Rule 9027(a) from the current deadline  
18 of April 29, 2019 to October 28, 2019. [ECF 1738].

19 The SLF Claimants understand the scope and complexity of PG&E’s Chapter 11 cases, and  
20 realize that it will take time for the cases to reach resolution. But the SLF Claimants submit that the  
21 following facts bear strongly on PG&E’s current request for an extension of the removal deadline.

22 PGE has stated repeatedly throughout these bankruptcy cases that one of the main purposes in  
23 its filing for bankruptcy relief was to resolve the wildfire claims as expeditiously as possible.

---

25 <sup>1</sup> “PG&E to file for Bankruptcy as Wildfire Costs hit \$30 billion”, *Los Angeles Times*, July 14, 2019,  
26 <https://www.latimes.com/business/la-fi-pge-bankruptcy-filing-20190114-story.html>.

27 <sup>2</sup> While there are other firms involved in the representation of the SLF Claimants, because each fire has a different  
28 group of firms involved, this group is referred to as the “SLF Claimants” for ease of reference.

1 At the initial 341(a) meeting of creditors held March 4, 2019, Jason Wells, Chief Financial  
2 Officer of PG&E Corporation, testified as follows:

3 We believe that the provisions of the bankruptcy process allow for a more  
4 expeditious resolution of these [wildfire] claims. When we evaluated the  
5 different ways to provide relief and to address the claims the company  
6 faced, we evaluated doing so through the state court process, which as you  
7 know would—could be an ad hoc process that could extend over a number  
8 of years. The bankruptcy court process allows us to establish a fair bar  
9 date, to estimate the value of these claims, and to work more expeditiously  
10 to resolution. And so in part the filing for bankruptcy was guided by the  
11 desire to bring resolution as timely as possible.

12 See the transcript attached as Exhibit “A” hereto, p. 45, ll. 2–14.

13 At the continued 341(a) meeting of creditors held April 29, 2019, PG&E’s Chief Financial  
14 Officer, Jason Wells, testified that prior to filing bankruptcy, PG&E estimated that resolving the  
15 wildfire claims in state court would take between three and five years—meaning that bankruptcy  
16 would allow PG&E to resolve the claims in less than three years.

17 The vast majority of the fire victims have not been compensated and are still living in very  
18 difficult circumstances. Many are in temporary housing. A significant number are homeless. Some  
19 victims have been waiting for three-and-one half years to get the compensation they need to rebuild  
20 their lives—and now with the bankruptcy, they must wait even longer.

21 The SLF Claimants request that the Court consider the above facts when setting the removal  
22 deadline currently requested by PG&E. It is imperative that these cases progress as quickly as  
23 possible, so that the suffering of the fire victims can come to an end.

24 Respectfully submitted,

25 Dated: May 7, 2019

SULLIVAN HILL REZ & ENGEL  
A Professional Law Corporation

By: /s/ Christopher V. Hawkins

James P. Hill

Christopher V. Hawkins

Attorneys for the Singleton Law Firm  
Fire Victim Claimants

**EXHIBIT “A”**

1 AUDIO TRANSCRIPTION  
2 ---oOo---  
3 NORTHERN DISTRICT OF CALIFORNIA  
4 SAN FRANCISCO DIVISION  
5 MARCH 4, 2019  
6 SECTION 341 MEETING OF CREDITORS  
7 IN THE MATTER OF  
8 PG&E CORPORATION  
9 BANKRUPTCY CASE NO. 19-30088  
10 AND  
11 PACIFIC GAS & ELECTRIC COMPANY  
12 BANKRUPTCY CASE NO. 19-30089  
13  
14  
15  
16  
17  
18  
19  
20

21 Transcribed by:

22

23 Diana Sasseen

24 CSR No. 13456

25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## APPEARANCES

TIMOTHY S. LAFFREDI, Assistant U.S. Trustee

For the Debtors:

STEPHEN KAROTKIN, Weil, Gotshal &amp; Manges

TOBIAS KELLER, Keller &amp; Benvenuto

---oOo---

## EXAMINATION

WITNESS

PAGE

JASON WELLS

Examination by Timothy Laffredi	10, 75
Examination by Gary Agajanian	22
Examination by Steve Campora	24
Examination by Angela J. Chun	41
Examination by Kirk Trostle	42
Examination by Tom Tosdal	44
Examination by Lindsay Wood	46
Examination by Bruce Worthington	48
Examination by Bill Daniels	50
Examination by Bradley Max	51
Examination by Gerald Singleton	53
Examination by Mike Danko	65

1 A. Well, let me also extend my deepest sympathies.  
2 We believe that the provisions of the  
3 bankruptcy process allow for a more expeditious  
4 resolution of these claims. When we evaluated the  
5 different ways to provide relief and to address the  
6 claims the company faced, we evaluated doing so through  
7 the state court process, which as you know would --  
8 could be an ad hoc process that could extend over a  
9 number of years. The bankruptcy court process allows us  
10 to establish a fair bar date, to estimate the value of  
11 these claims, and to work more expeditiously to  
12 resolution. And so in part the filing for bankruptcy  
13 was guided by the desire to bring resolution as timely  
14 as possible.

15 Q. I appreciate the interest in the need for  
16 speed, but my question's a little bit different; and  
17 that is that you have a system designed for financial  
18 losses, but you have massive and ongoing human suffering  
19 here. And how is that going to play in your thinking  
20 about reorganizing? I mean, is that a factor for you  
21 all, or how much of a factor will that be?

22 A. It is absolutely a factor. We understand that  
23 we've lost the trust of the community that we serve,  
24 that the human toll that these fires have created are --  
25 can't be expressed in words. We need to make the

## 1 REPORTER'S CERTIFICATE

2 I, the undersigned, a Certified Shorthand  
3 Reporter of the State of California, do hereby certify:

4 That the foregoing electronically-recorded  
5 proceedings were transcribed by me to the best of my  
6 ability.

7 I further certify I am neither financially  
8 interested in the action nor a relative or employee of  
9 any attorney or party to this action.

10 IN WITNESS WHEREOF, I have this date  
11 subscribed my name.

12

13 Dated: April 16, 2019

14

15

16

\_\_\_\_\_  
Diana Sasseen  
CSR No. 13456

17

18

19

20

21

22

23

24

25